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11 ALLIED COLLECTION SERVICES, INC.

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 Abilio Hernandez,

15 Plaintiff,

16 vs.

17 Allied Collection Services, Inc.,

18 Defendant.

Case No.: 2:19-cv-00291-JCM-VCF

**JOINT STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(Second Request)**

19
20 Plaintiff Abilio Hernandez ("Plaintiff") and Defendant Allied Collection Services, Inc.
21 ("Defendant") (Plaintiff and Defendant are hereinafter collectively referred to as "the Parties"),
22 by and through their respective counsel, hereby stipulate to modify the Court's Scheduling Order,
23 ECF No. 27, to extend the following deadlines by approximately three months:

- 24 1. The last date to complete discovery is continued from November 7, 2019 to
25 **January 20, 2020;**
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27
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1 2. The last date to file dispositive motions is continued from December 6, 2019, to
2 **March 6, 2020**; and

3 3. The last date to file the proposed joint pretrial order from January 6, 2020, to
4 **April 6, 2020**.

5
6 Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The Parties have
7 been diligent in propounding discovery. Furthermore, Plaintiff has already taken Defendant's
8 deposition under Rule 30(b)(6) and Defendant has taken Plaintiff's deposition. Plaintiff intends
9 to depose a fact witness and possibly re-open the deposition of Defendant. The Parties also
10 disclosed experts. Due to conflicting schedules various witnesses and the Parties' counsel, the
11 Parties are unable to complete outstanding depositions by the current Discovery Cut-off Date of
12 November 7, 2019. Furthermore, due to holidays and previously scheduled personal and
13 business matters, the Parties request that discovery and related dates be extended until after the
14 new year.
15

16
17 Additionally, the Parties are actively engaged in discussions that may potentially resolve
18 this case.

19 This request for extension of deadlines is made specifically in this fee-shifting matter
20 since depositions and experts are a significant expense. The Parties therefore seek to extend the
21 discovery deadlines by approximately 90 days.
22

23 Pursuant to LR 26-4(a), Plaintiff has propounded written discovery requests on Defendant
24 and has taken Defendant's Rule 30(b)(6) deposition. Defendant has propounded written discovery
25 requests and has taken Plaintiff's deposition.
26

27 Pursuant to LR 26-4(d), the Parties propose the following discovery schedule:

28 (1) Last date to complete discovery: January 20, 2020;

1 (2) Last date to file dispositive motions: March 6, 2020; and

2 (3) Last date to file the proposed joint pretrial order: April 6, 2020.

3 For these reasons, the Parties jointly request that this Court modify the Scheduling Order to
4 provide an additional 90 days to complete discovery, and the in the ordinary course file
5 dispositive motions, and the proposed joint pretrial order as described in the proposed timeline
6 above.
7

8 This is the Parties' second request for an extension of these deadlines.

9 DATED this 4th day of November 2019.
10

11 Respectfully submitted,

12 **KAZEROUNI LAW GROUP, APC**
13

14 By: /s/ Gustavo Ponce
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- (1) Last date to complete discovery: **January 20, 2020;**
- (2) Last date to file dispositive motions: **March 6, 2020;**
- (3) If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after the decision on the dispositive motions or further court order, and
- (4) If no dispositive motions are filed, the last date to file the proposed joint pretrial order: **April 6, 2020.**

Carla Fendler

November 15, 2019

Dated: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on November 6, 2019, the foregoing stipulation was filed and served via CM/ECF to all parties appearing in this case.

CARLSON & MESSER LLP

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